

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
\_\_\_\_\_ DIVISION

Lakisha Howell

(Enter Above the Name of the Plaintiff in this Action)

1:20CV819

vs.

New Scotland Health CARE, LLC

(Enter above the name of the Defendant in this Action)

**J. COLE**

**MJ. BOWMAN**

If there are additional Defendants, please list them:

Jacob Stern

Anthony Jagoditz

Shawn Crossby

Jeffery Huth

Diane Plymire

**RECEIVED**

OCT 19 2020

**RICHARD W. NAGEL**  
Clerk Of Court  
CINCINNATI, OHIO

**COMPLAINT**

**I. Parties to the action:**

**Plaintiff:** Place your name and address on the lines below. The address you give must be the address where the court may contact you and mail documents to you. A telephone number is required.

Lakisha Howell

Name - Full Name Please - PRINT

3719 Reading Road Apt 209

Street Address

Cincinnati, OH, 45229

City, State and Zip Code

(513) 780-8475

Telephone Number

If there are additional Plaintiffs in this suit, a separate piece of paper should be attached immediately behind this page with their full names, addresses and telephone numbers. If there are no other Plaintiffs, continue with this form.

Defendant(s):

Place the name and address of each Defendant you listed in the caption on the first page of this Complaint. This form is invalid unless each Defendant appears with full address for proper service.

1. JACOB STERN  
Name - Full Name Please  
13416 Lincoln Ave, Cincinnati, OH 45206  
Address: Street, City, State and Zip Code
2. Anthony Jagoditz  
255 E. Fifth Street Suite 1900, Cincinnati OH 45202
3. Shawn Crosby  
30 W Spring Street, Columbus, OH 43215
4. Diane Plymire  
1 Sheakley Way, Cincinnati, OH 45246
5. Jeffery Huth  
1150 W 8th Street, Cincinnati OH 45203
6. \_\_\_\_\_  
\_\_\_\_\_

If there are additional Defendants, please list their names and addresses on a separate sheet of paper.

II. Subject Matter Jurisdiction

Check the box or boxes that describes your lawsuit:

- ☒ Title 28 U.S.C. § 1343(3)  
[A civil rights lawsuit alleging that Defendant(s) acting under color of State law, deprived you of a right secured by federal law or the Constitution.]
- ☒ Title 28 U.S.C. § 1331  
[A lawsuit "arising under the Constitution, laws, or treaties of the United States."]
- ☐ Title 28 U.S.C. § 1332(a)(1)  
[A lawsuit between citizens of different states where the matter in controversy exceeds \$75,000.]
- ☐ Title \_\_\_\_\_ United States Code, Section \_\_\_\_\_  
[Other federal status giving the court subject matter jurisdiction.]

## III. Statement of Claim

Please write as briefly as possible the facts of your case. Describe how each Defendant is involved. Include the name of all persons involved, give dates and places.

Number each claim separately. Use as much space as you need. You are not limited to the papers we give you. Attach extra sheets that deal with your statement claim immediately behind this piece of paper.

- 1) Jacob Stern - Egregious Fraud, Business Tort, Reckless Negligence, Exploitation, Discrimination, <sup>Racial</sup> Deceit on 1/6/20 to Plaintiff due to unsafe Health care equipment on private property causing work injury. (20-103433) <sup>2nd claim</sup>
- 2) Anthony Jagodzinski - Egregious Fraud, conflict of interest, Negligence, Deceit, Manipulation, exploitation, Reckless Bias prejudice, intentional Tort, Racial Discrimination, ~~Reckless~~ on 1/6/20 work injury causing personal injury to Plaintiff.
- 3) Shawn Crosby - Fraud, conflict of interest, deceit, Reckless Intentional Tort, exploitation, Negligence, Manipulation Business Tort on 1/6/20 work injury to Plaintiff on private property due to employer unsafe HealthCare equipment causing Plaintiff personal injury.
- 4) Jeffery Huth - Mal Practice, Fraud, Conflict of interest, intentional Tort, Bias, Prejudice, Deceit, Reckless Negligence to Plaintiff work injury on 1/6/20
- 5) Diane Phymire - Fraud, Business Tort, deceit, Reckless exploitation, Racial Discrimination and Negligence on 1/6/20 Plaintiff work injury due to unsafe Healthcare equipment on private property causing personal injury.

## IV. Previous lawsuits:

If you have been a Plaintiff in a lawsuit, for each lawsuit state the case number and caption.  
(Example, Case Number: 2:08-cv-728 and Caption: John Smith vs. Jane Doe).

Case NumberCaption

\_\_\_\_\_. vs. \_\_\_\_\_  
\_\_\_\_\_. vs. \_\_\_\_\_  
\_\_\_\_\_. vs. \_\_\_\_\_

## V. Relief

In this section please state (write) briefly exactly what you want the court to do for you. Make no legal argument, cite no case or statutes.

I the Plaintiff Am demanding A fair Judgement  
in the Amount of \$75,000 for Damages  
~~on negligence by my defendant~~ for:

- |                                    |   |
|------------------------------------|---|
| 1) Negligence                      | 13) Worry                               |
| 2) Personal Injury                 | 14) Inconvenience                       |
| 3) Pain and Suffering              | 15) Loss of enjoyment of life           |
| 4) Emotional Distress              | 16) Life Disruption / Family Disruption |
| 5) Mental Distress                 | 17) Anxiety                             |
| 6) Bodily Harm / Physical Injury   | 18) Stress                              |
| 7) Unpaid Medical Bills / Debt     | 19) Loss of Job                         |
| 8) <del>Personal Humiliation</del> | 20) Loss future wages and overtime      |
| 9) Public embarrassment            | 21) Financial Crisis / Covid            |
| 10) Public Hate                    | 22) <sup>19</sup> Disaster              |
| 11) Fear                           | 23) Slight defamation                   |
| 12) Grief                          | 24) Loss of Job opportunities           |
|                                    | 25) Massive Debt                        |
|                                    | 26) Defamation of character             |
|                                    | 27) Severe economic loss                |

I state under penalty of perjury that the foregoing is true and correct. Executed on

this \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

Laurel Howell  
Signature of Plaintiff